

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSUNG ELECTRONICS CO., LTD., and  
SAMSUNG ELECTRONICS AMERICA, INC.,  
Petitioners,

v.

PAYGEO, LLC,  
Patent Owner.

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Case IPR2025-01551  
U.S. Patent No. 8,554,671

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**PATENT OWNER'S PRELIMINARY RESPONSE**

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**PATENT OWNER'S EXHIBIT LIST**

| EXHIBIT | DESCRIPTION                                                                                                                                                                                                                                                                                                                                                            |
|---------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2001    | Excerpts of File History for U.S. Patent Application Publication No. 2015/0161592                                                                                                                                                                                                                                                                                      |
| 2002    | Complaint for Patent Infringement, <i>PayGeo, LLC v. Samsung Elecs. Co.</i> , No. 25-cv-00334-RWS-RSP, Dkt. No. 1 (E.D. Tex. Apr. 2, 2025)                                                                                                                                                                                                                             |
| 2003    | Second Amended Docket Control Order, <i>PayGeo, LLC v. Samsung Elecs. Co.</i> , No. 25-cv-00334-RWS-RSP, Dkt. No. 52 (E.D. Tex. Oct. 2, 2025)                                                                                                                                                                                                                          |
| 2004    | Order, <i>Resonant Sys., Inc. v. Sony Grp. Corp.</i> , No. 2:22-cv-00424-JRG, Dkt. No. 84 (E.D. Tex. July 9, 2024)                                                                                                                                                                                                                                                     |
| 2005    | Excerpts of Defendants' Invalidity Contentions, <i>PayGeo, LLC v. Samsung Elecs. Co.</i> , No. 25-cv-00334-RWS-RSP (E.D. Tex.), served on November 3, 2025                                                                                                                                                                                                             |
| 2006    | Docket Navigator webpage, Motion Outcomes for Motions to Stay Pending <i>Inter Partes</i> Review in the Eastern District of Texas, dated January 1, 2020 through November 21, 2025                                                                                                                                                                                     |
| 2007    | Lex Machina webpage, Motion Metrics for Stay Pending PTAB in the Eastern District of Texas, dated January 1, 2020 through November 21, 2025                                                                                                                                                                                                                            |
| 2008    | Excerpts from U.S. District Court – Federal Case Management Statistics, Median Time from Filings to Trial (E.D. Tex.), 12-Month Periods Ending June 30, 2025, available at <a href="https://www.uscourts.gov/sites/default/files/document/fcms_na_distprofile0630.2025.pdf">https://www.uscourts.gov/sites/default/files/document/fcms_na_distprofile0630.2025.pdf</a> |
| 2009    | Docket Navigator Webpage, Time to Trial in the Eastern District of Texas, dated January 1, 2022 through November 21, 2025                                                                                                                                                                                                                                              |
| 2010    | U.S. Patent Application Publication No. 2013/0024360-A1                                                                                                                                                                                                                                                                                                                |

Patent Owner's Preliminary Response  
IPR2025-01551 (U.S. Patent No. 8,554,671)

| EXHIBIT | DESCRIPTION                                                                                                                       |
|---------|-----------------------------------------------------------------------------------------------------------------------------------|
| 2011    | Order, <i>Kirsch Rsch. and Dev. LLC v. DuPont de Nemours, Inc.</i> , No. 5:20-cv-00057-RWS, Dkt. No. 269 (E.D. Tex. July 7, 2021) |
| 2012    | U.S. Patent Application Publication No. 2004/0122771-A1 to Celi, Jr.                                                              |

## **I. INTRODUCTION**

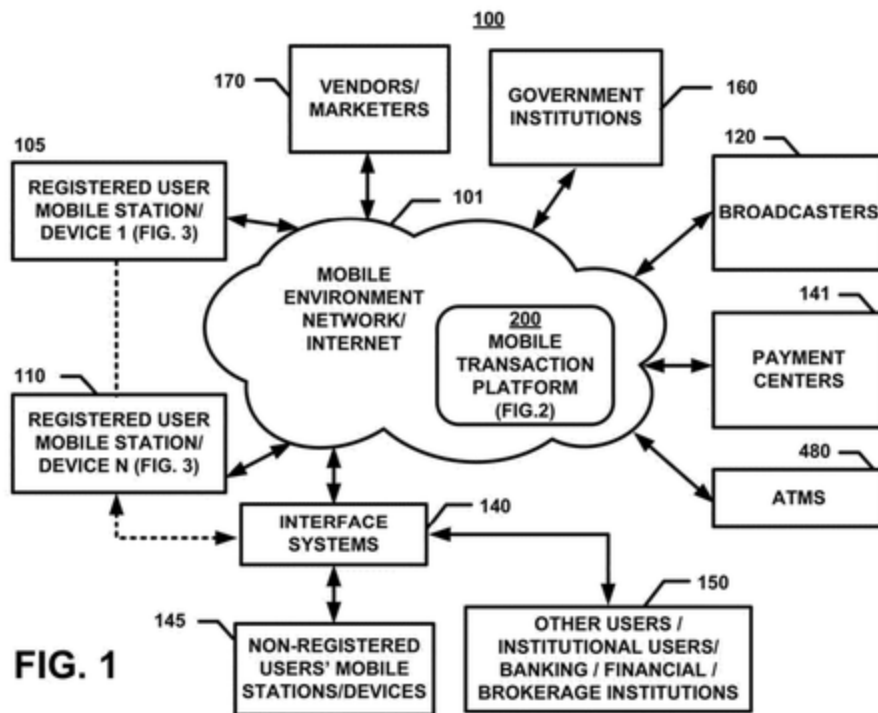
The Director should deny institution of this Petition because the asserted references do not disclose the requisite “second user mobile station” in a financial transaction. *Look*, alone or in combination with *Stallings*, fails to disclose or render obvious a cashless platform of enabling users to perform a financial transaction in a mobile environment, involving a “first user mobile station” that is in proximity to “a second user mobile station.” *Look* discloses conducting transactions with a merchant’s point-of-sale (POS) system, which is not a user mobile station. The Office reached a similar conclusion when it allowed the ’671 Patent over prior art describing a transaction between a portable device and an automated teller machine (ATM). *Stallings* makes no mention of financial transactions at all, let alone between two user mobile stations. And Petitioner Samsung fails to establish a logical motivation, absent impermissible hindsight, for a POSITA to replace *Look*’s POS system to yield the claimed invention. Thus, institution should be denied.

## **II. OVERVIEW**

### **A. The ’671 Patent**

The ’671 Patent is directed towards a “cashless platform of enabling users to perform a financial transaction in a mobile environment.” ’671 Patent, Claim 1. The Challenged Claims require “a first user mobile station” that “is in proximity to a second user mobile station.” *Id.* The ’671 Patent teaches generating a code that

contains financial information related to a financial transaction and transferring that code to the second user mobile station “by means of a directional movement on the first user mobile station in the direction of the second user mobile station.” *Id.* The '671 Patent also recites a “mobile transaction platform” that “confirm[s] the executability of the financial transaction” and a second user mobile station configured to determine whether to “accept or decline the financial transaction,” as illustrated in FIG. 1:



'671 Patent, Fig. 1.

**B. The Examiner Found the Prior Art Lacked the Mobile Device to Mobile Device Financial Transactions**

The '671 Patent underwent a substantive examination. PayGeo successfully distinguished prior art in the Examiner's anticipation rejection (U.S. Patent Application Publication No. 2004/0122771 - Celi, Jr.), which disclosed communication between a portable device that generates a scannable code and an ATM that scans the code. Ex. 1002 at 150-160; Ex. 2012 (Celi, Jr.). Specifically, PayGeo showed that the term "user mobile station" was not merely interchangeable with ATM, and that the prior art did not teach "a direct transfer between two user mobile stations but rather between a mobile device and an ATM." Ex. 1002 at 152. PayGeo showed that, for similar reasons, the prior art of record failed to disclose the other limitations of the claims:

Since the second user mobile station is not accounted for in Celi et al., then the missing second user mobile station cannot automatically recognize the transferred code. Based on the recognized code, the omitted second user mobile station in Celi et al. is not capable of offering a decision as to whether to accept or decline the financial transaction. In addition, Celi et al. does not teach that the second user mobile station transmits a reverse code to the first user mobile station, to confirm whether the financial transaction was either accepted or declined by the second user mobile station.

*Id.* at 153. In response, the Examiner withdrew the prior art rejections and allowed the claims, after certain minor amendments. *Id.* at 191.

For reasons discussed below, Samsung's asserted references in their Petition are no better than the references distinguished during examination, such that there is no reason to institute the Petition.

**C. *Look* Does Not Disclose Financial Transactions between Two User Mobile Stations**

*Look* (Ex. 1005) does not disclose financial transactions between two user mobile stations (i.e., “the first user mobile station generating a code containing the financial information on the first user mobile station, wherein the first user mobile station is in proximity to a second user mobile station”). Rather, *Look* discloses conducting business transactions with a merchant. *Look* at Abstract (“[A] mobile electronic device such as a mobile phone or the like can be used to purchase goods from a merchant.”). *Look* describes a stationary payee, “such as a retail store, an online vendor, a secured documents government agency or the like.” *Id.* at [0012]. *Look*'s payee depicted is in Figure 1 as a point-of-sale register (depicted in purple) having a reading device 22 or secure identification device 24:

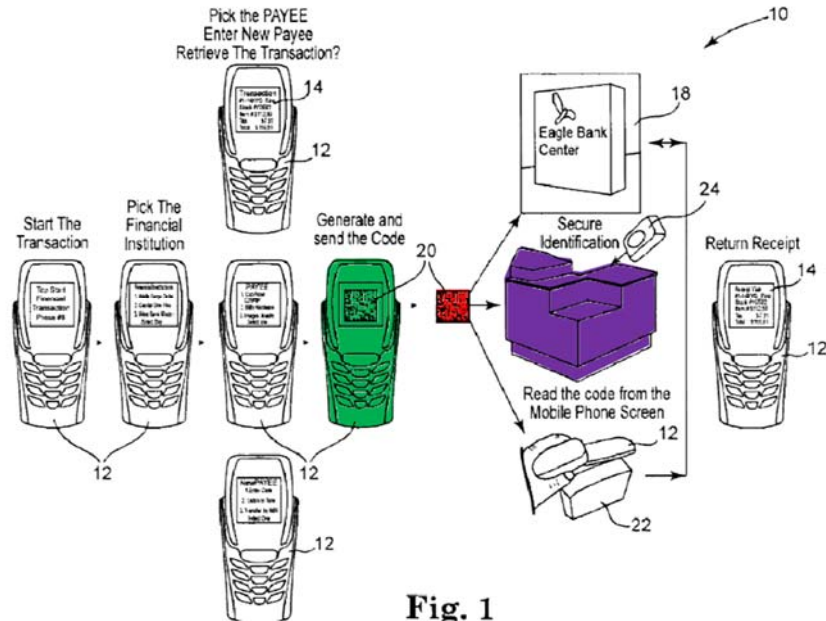


Fig. 1

Pet. at 12 (citing *Look*, Fig. 1) (annotations reproduced). For the reasons below, *Look* fails to disclose any payee that a POSITA would have understood constitutes a “second user mobile station.”

**D. *Stallings* Does Not Disclose Financial Transactions between Two User Mobile Stations**

*Stallings* (Ex. 1006) discloses a system for “gesture-based item delivery” to “transfer items (e.g., objects, data, images, audio, video, links, text, copies of files, etc.) from one mobile device (e.g., mobile device 100-1) to another mobile device (e.g., mobile device 100-2).” *Stallings* at [0014]-[0015]. For example, *Stallings* describes “a contact management program” that delivers contact cards:

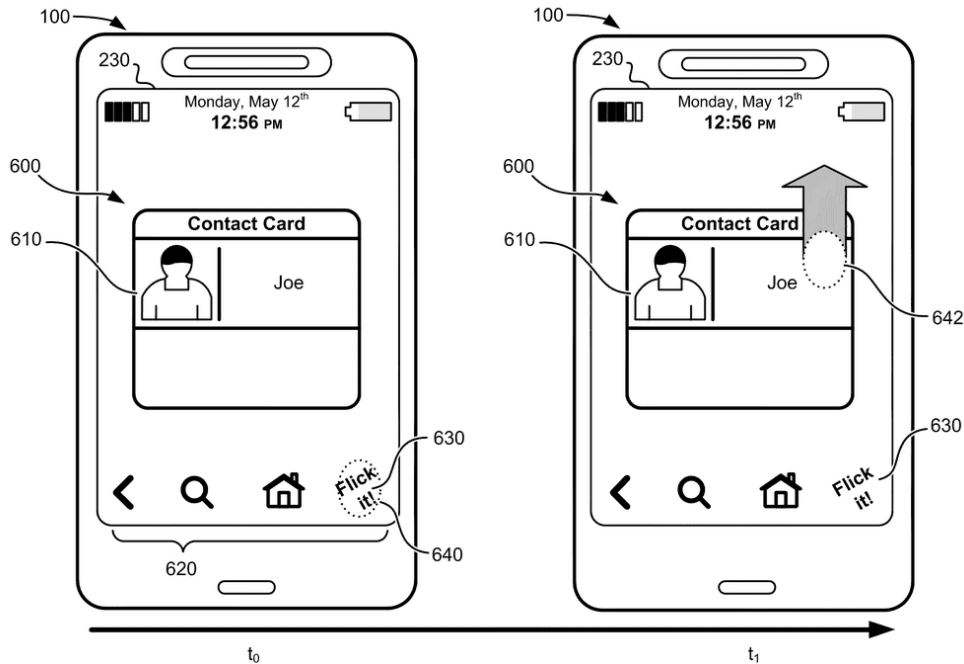


FIG. 6A

*Id.*, Fig. 6A; *id.* at [0050], [0052]-[0053]. However, *Stallings* does not disclose any financial transactions whatsoever, let alone financial transactions between two user mobile stations.

**E. *Tumminaro* Does Not Cure Deficiencies in *Look/Stallings***

*Tumminaro* (Ex. 1007) is a secondary reference relied upon by Samsung in Ground 2 to allegedly teach limitations [1e], [1g]-[1j], to the extent *Look* and *Stallings* do not disclose a “mobile transaction platform.” Pet. at 46-56. However, Samsung fails to show how *Tumminaro* would cure the deficiencies of at least limitation [1b] and teach a modification to *Look* and/or *Stallings* that would yield financial transactions between two user mobile stations (i.e., “the first user mobile station generating a code containing the financial information on the first user mobile

station, wherein the first user mobile station is in proximity to a second user mobile station”). ’671 Patent at 23:45-48 (Claim 1); see Pet. at 46.

### III. SAMSUNG’S CHALLENGE AND ASSERTED REFERENCES

The Petition presents the following grounds for challenging the claims of the ’671 Patent.

| Ground | Claims      | Basis | References Relied Upon                                                               |
|--------|-------------|-------|--------------------------------------------------------------------------------------|
| 1      | 1-3, and 22 | § 103 | <i>Look</i> (Ex. 1005) and <i>Stallings</i> (Ex. 1006)                               |
| 2      | 1-3, and 22 | § 103 | <i>Look</i> (Ex. 1005), <i>Stallings</i> (Ex. 1006), and <i>Tumminaro</i> (Ex. 1007) |

Pet. at 10.

Although there are multiple reasons the ’671 Patent is valid over *Look*, *Stallings*, and *Tumminaro*, this Preliminary Response focuses on only limited reasons why *inter partes* review should not be instituted. See *Travelocity.com L.P. v. Cronos Techs., LLC*, No. CBM2014-00082, Paper 12 at 10 (P.T.A.B. Oct. 16, 2014) (“[N]othing may be gleaned from the Patent Owner’s challenge or failure to challenge the grounds of unpatentability for any particular reason.”).

### IV. LEVEL OF ORDINARY SKILL IN THE ART

For purposes of this Preliminary Response only, PayGeo adopts Samsung’s definition of a person of ordinary skill in the art: “A person of ordinary skill in the art (‘POSITA’) would have had at least a bachelor’s degree in electrical engineering,

computer science, or a similar field and at least two years of experience in the field of mobile applications and/or related payment systems. Additional relevant work experience can compensate for less education, and vice versa.” Pet. at 9.

## V. THE CHALLENGED CLAIMS ARE PATENTABLE

### A. *Look and Stallings* Do Not Disclose a Second User Mobile Station in a Financial Transaction (All Grounds)

*Look and Stallings* do not disclose or render obvious a “second user mobile station” or performing a financial transaction involving a “second user mobile station,” which is recited in nearly every limitation of the Challenged Claims:

the first user mobile station generating a code containing the financial information on the first user mobile station, wherein the first user mobile station is in proximity to a *second user mobile station*;

the first user mobile station transferring the generated code to *the second user mobile station* by means of a directional movement on the first user mobile station in the direction of the *second user mobile station*;

*the second user mobile station* automatically recognizing the transferred code;

based on the recognized code, *the second user mobile station* determines whether to accept or decline the financial transaction;

wherein when the financial transaction is accepted by the second mobile user station, the mobile transaction platform executing the financial transaction;

wherein when the financial transaction is declined by the second user mobile station, the mobile transaction platform preventing the execution of the financial transaction; and

the second user mobile station transmitting a reverse code to the first user mobile station, to confirm whether the financial transaction was either accepted or declined by the second user mobile station.

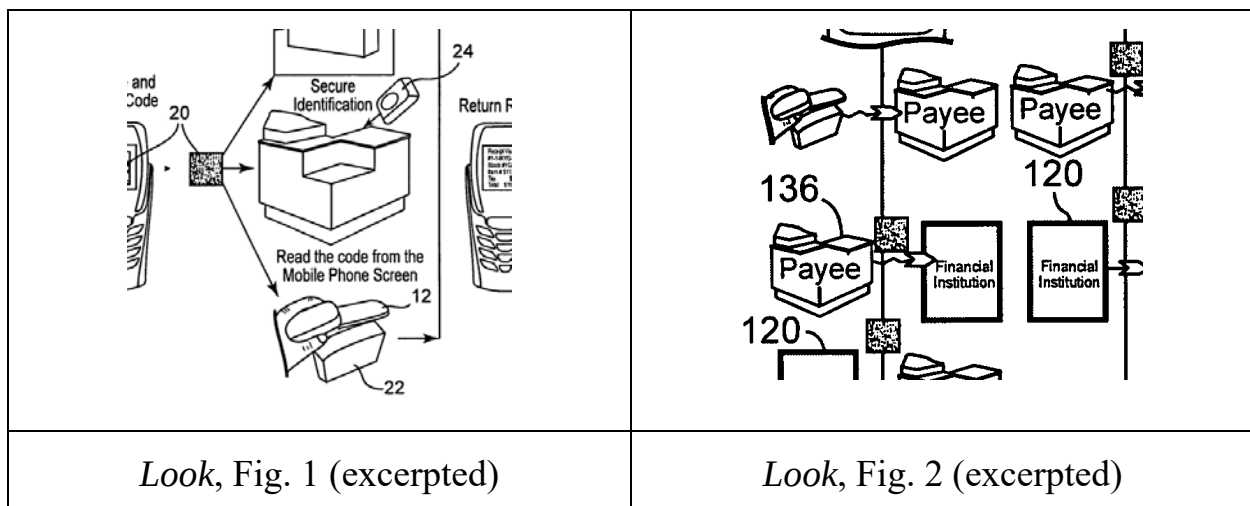
'671 Patent, Claim 1 (emphasis added).

**1. Look's Payee Device Is Not a "Second User Mobile Station"**

Like the *Celi, Jr.* reference distinguished during prosecution of the '671 Patent, *Look* does not disclose a "second user mobile station." *Cf.* Pet. at 20-21; see § II.B, *supra*.

*Look* enables a payer with a mobile phone to conduct transactions with a payee, such as a retail store or merchant, "not a second user mobile station." See *Look* at Abstract (disclosing "a mobile electronic device such as a mobile phone or the like can be used to purchase goods from a merchant"); *id.* at [0012] ("The payee is typically the recipient of the financial or secure transaction such as a retail store, an online vendor, a secured documents government agency or the like."). Payee data

is sent to a “payee computer at the point of sale/transaction” or “a point of sale system or a transaction card terminal.” *Id.* at [0033], [0036]; *see also id.* at [0020] (“[t]he code can be at the point of sale **counter**”) (emphasis added), [0047] (“For example, receipt data can be sent to a point of sale system or a transaction card terminal”). *Look* also graphically depicts the “payee” as a large, point-of-sale fixture in all of its Figures:



*See also id.* at [0044] (discussing payee at reference numeral 136). *Look*, therefore, contemplates a fixed point-of-sale system where “an individual provides a transaction card for payment by providing it to a sales person or clerk; or, by swiping the transaction card through a reader or electronic point of sale reading and communication device.” *Id.* at [0004].

The deficiencies in *Look* are consistent with the prior art distinguished over the '671 Patent during examination. Just as the *Celi, Jr.* reference cited by the

Examiner that was limited to a financial transfer between a mobile device and an ATM, the *Look* reference relied upon by the Petition is similarly limited to teaching a financial transaction between a mobile device and a point-of-sale system. See § II.B, *supra*.

In its Petition, Samsung argues that “*Look* discloses that the payee’s device can be a ‘computer,’” but *Look* does not provide an explanation or definition of “computer” or “payee computer” that includes desktop and mobile computers. Pet. at 20-21 (citing *Look* [0033]); see *Look* at [0006] (providing examples of “mobile or portable devices,” but not “computer”). Samsung attempts to use extrinsic evidence to show that “POSITAs would have understood that the term ‘computer’ would include both desktop and mobile computers.” Pet. at 21 (citing Ex. 1001 at 1:19-36, *Look* at [0006], *Stallings* at [0017], *Tumminaro* at [1149], Ex. 1009 at [0002], Ex. 1018 at [0046], Ex. 1019 at [0063]).

But none of the cited portions of these exhibits provide a discussion or definition of the term “computer” or “payee computer” that supports Samsung’s argument about a POSITA’s understanding. See ’671 Patent at 1:19-36 (describing “mobile communications devices” not “computer”/“payee computer”); *Look* at [0006] (providing examples of “mobile or portable devices” and not “computer”/“payee computer”); *Stallings* at [0017] (provides examples of a “device”); *Tumminaro* at [1149] (providing examples of “mobile consumer

communications devices” and not “computer”); Ex. 1009 at [0002] (providing examples of “personal mobile devices” not “computer”); Ex. 1018 at [0046] (describing “[e]xemplary payer devices,” not payee device or “computer”); Ex. 1019 at [0063] (providing examples of “user devices” not “computer”).

Also, Samsung points to the disclosure of a “mobile phone two-dimensional optical code reader” being used in conjunction with *Look*’s payee computer, suggesting the presence of the phrase “mobile phone” means that *Look*’s payee computer is a mobile phone. Pet. at 20-21 (citing *Look* at [0033]). This is incorrect. *Look*’s “mobile phone two-dimensional optical code reader” is a component of the payee’s computer that reads a two-dimensional optical code present on the payer’s mobile phone. See *Look* at [0033]; *id.* at [0019] (“The code is also readable on the mobile phone screen using an optical code reader.”). The fact that the payee computer can read a two-dimensional optical code from a mobile phone does not imply that the payee’s computer is a mobile phone.

Next, Samsung’s argument that “*Look*’s reference to plural ‘devices’ shows that it contemplated two or more mobile devices involved in the transactions” is without merit. Pet. at 21 (citing *Look* at [0002], [0005]-[0006]). The natural reading of *Look*’s reference to plural mobile devices is that the system allows for multiple customers, each making a transaction with the payee point-of-sale system using their respective mobile device. *Look* at [0002] (“methods and systems for conducting

secure business transactions with electronic devices such as mobile handheld electronic devices”); *id.* at [0005] (“there is an emerging change from using transaction cards for business transactions to using mobile devices such as phones and similar personal handheld electronic devices for conducting such business transactions”); *id.* at [0006] (“methods and systems for securely transferring data through mobile devices to be used in transactions that involve payments or data that requires high security,” “[a]ny mobile or portable devices that function to store and/or share data can be used in accordance with the present invention”). Samsung’s position is also inconsistent with *Look*’s reference to a singular “device” in its Abstract and claims. *Look* at Abstract (“Methods and systems for conducting transactions using an electronic device are provided” and “a mobile electronic device such as a mobile phone or the like can be used to purchase goods from a merchant.”) (emphasis added); *id.* at Claim 1 (“A method of conducting a transaction using an electronic device”) (emphasis added).

In sum, Samsung fails to show that a POSITA would have understood that *Look*’s payee device is a “second user mobile station.”

## **2. It Would Not Have Been Obvious to Modify *Look*’s Payee Device with a Second User Mobile Station**

Samsung also fails to demonstrate that a POSITA would have been motivated to modify *Look*’s payee device to be a mobile device. Pet. at 23-24. Samsung argues a “straightforward modification” where “the hardware of *Look*’s payee device could

have easily been modified to be one of these well-known mobile devices.” *Id.* (“*Look’s* payee device *could have* easily been modified”) (emphasis added). But the alleged ease at which a modification could be made is the wrong query under an obviousness analysis. “[O]bviousness concerns whether a skilled artisan not only *could have made* but *would have been motivated to make* the combinations or modifications of prior art to arrive at the claimed invention.” *Belden Inc. v. Berk-Tek LLC*, 805 F.3d 1064, 1073 (Fed. Cir. 2015).

Here, Samsung argues that “[a] POSITA would have recognized that the mobility of users would be improved if *Look’s* payee device was a mobile device that can be carried anywhere. Pet. at 23 (citing Lipoff, ¶¶ 85-86; *Look* at [0005]-[0006], *Stallings* at [0001], [0015]; *Tumminaro* at [0009]-[0010]). But none of the cited references make any mention of “mobility” or describe any benefits of “mobility” to a payee device, such as *Look’s* “payee computer.”

Indeed, Samsung fails to demonstrate any appreciable benefit for a payee’s point-of-sale system to be replaced with a mobile device. A POSITA would understand that *Look’s* payee devices are located in fixed locations within a retail store (i.e., stationary point-of-sale systems in checkout aisles or counters). Samsung has failed to demonstrate an appreciable benefit at the time the invention was made (July 18, 2011) to “enable transactions to be performed from anywhere” (Pet. at 24) when aspects of a transaction must be handled in fixed locations within the retail

store. For example, *Look* teaches receiving and printing of receipt data are performed at “a point of sale system or a transaction card terminal,” which points to transactions occurring at the fixed location. *Look* at [0047].

Furthermore, even *Look* cautions a POSITA about “using mobile devices such as phones and similar personal handheld electronic devices for conducting such business transactions” because “[o]ne problem is that the electronic devices are often not secure enough,” and “paper trail to memorialize or validate the financial transaction is typically not available.” *Id.* at [0005]. If *Look* informs a POSITA that using one mobile device has problems about being “not secure enough” for business transactions, then a POSITA would have understood that using two mobile devices for both sides of the financial transaction, as Samsung proposes, would have doubled the security concerns. These security concerns articulated by *Look* teach away from the proposed combination, or at least defeat Samsung’s conclusory motivation for substituting *Look*’s payee device with a mobile device. *Arctic Cat Inc. v. Bombardier Recreational Prods. Inc.*, 876 F.3d 1350, 1360 (Fed. Cir. 2017) (“As our precedent reflects, prior art need not explicitly ‘teach away’ to be relevant to the obviousness determination. Implicit in our discussion of the ‘degree’ of teaching away is an understanding that some references may discourage more than others.”). A POSITA would not have been motivated to modify *Look*’s payee device to reach the claimed invention.

In sum, *Look* and *Stallings* do not disclose or render obvious a “second user mobile station,” as required by at least limitation [1b]: “the first user mobile station generating a code containing the financial information on the first user mobile station, wherein the first user mobile station is in proximity to a second user mobile station.”<sup>1</sup>

## VI. CONCLUSION

For all of these reasons, PayGeo requests that the Director deny institution of *inter partes* review of the Challenged Claims of the '671 Patent.

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<sup>1</sup> *Tumminaro* is relied upon in Ground 2, but only for limitations [1e], [1g]-[1j]. Pet. at 46 (incorporating its arguments “[a]s discussed above for Ground 1, *Look* discloses, or *Look* and *Stallings* render obvious, limitations [1pre]-[1d] and [1f])”). As such, *Tumminaro* fails to cure any deficiencies in the combination of *Look* and *Stallings* with respect to claim limitations [1b].

Patent Owner's Preliminary Response  
IPR2025-01551 (U.S. Patent No. 8,554,671)

Respectfully submitted,

Date: January 7, 2026

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**CERTIFICATE OF COMPLIANCE WITH 37 C.F.R. § 42.24**

The undersigned hereby certifies that the portions of the foregoing **PATENT OWNER'S PRELIMINARY RESPONSE** has 3,052 words in compliance with the 14,000 word limit set forth in 37 C.F.R. § 42.24. This word count was prepared using the Microsoft Word word-processing system used to prepare this paper.

Dated: January 7, 2026

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*Attorneys for Patent Owner*  
PayGeo, LLC

**CERTIFICATE OF SERVICE**

The undersigned certifies, in accordance with 37 C.F.R. § 42.6(e), and pursuant to agreement by the parties that filing with the Board through the Patent Trial and Appeal Case Tracking System (P-TACTS) constitutes electronic service, service was made on Petitioners as detailed below.

|                          |                                                                                                                                                                                                                                                                                |
|--------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>Date of service</i>   | January 7, 2026                                                                                                                                                                                                                                                                |
| <i>Manner of service</i> | Electronic Filing with the Board<br>(joshua.goldberg@finnegan.com;<br>benjamin.saidman@finnegan.com;<br>nicholas.cerulli@finnegan.com;<br>alexander.boyer@finnegan.com;<br>christina.yang@finnegan.com;<br>christopher.anderson@finnegan.com;<br>connor.mcgregor@finnegan.com) |
| <i>Documents served</i>  | PATENT OWNER'S PRELIMINARY RESPONSE                                                                                                                                                                                                                                            |
| <i>Persons Served</i>    | Finnegan, Henderson, Farabow,<br>Garrett & Dunner, LLP:<br>Joshua L. Goldberg<br>Benjamin A. Saidman<br>Nicholas A. Cerulli<br>Alexander M. Boyer<br>Christina Ji-Hye Yang<br>Christopher B. Anderson<br>Connor M. McGregor                                                    |

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